

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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March 17, 2020

**Via Electronic Filing**

The Honorable Magistrate Judge Sanket J. Bulsara  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East, Courtroom 324N  
Brooklyn, New York 11201

Re: *Marcos v. Cafe Riviera Inc. et al*  
Case No.: 19-cv-03981

Dear Honorable Magistrate Judge Bulsara:

This law firm is counsel Defendants Cafe Riviera Inc., Malgorzata Tokarska, and Eva Tokarska (collectively, the “**Defendants**”) in the above-referenced action.

Pursuant to Rule II(A) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to extend the mediation completion deadline currently scheduled for April 3, 2020 to, through and including, May 3, 2020. This is the first request of an extension of the mediation completion deadline, and is not made on consent of Plaintiff’s counsel. This request would not affect any other scheduled deadlines.

The basis of the request is that Defendants require additional time to gather additional records, and make accommodations for conducting the deposition remotely. Needless to say, the COVID-19 pandemic has complicated previously scheduled deadlines.

In light of the foregoing, and out of an abundance of caution, Defendants respectfully request that the mediation completion deadline currently scheduled for April 3, 2020 be extended to, through and including, May 3, 2020.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
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To: All Counsel of Record (via ECF)